REMARKS

Applicant respectfully requests reconsideration of this application and consideration of the following remarks.

Claims 20-96 were rejected under 35 U.S.C. 103(a). The independent claims, claims 20, 32, 55, 62, 76 and 83, were rejected in view of Tso (U.S. Patent No. 6,072,598) and Magallanes (U.S. Patent No. 5,925,103); and additional references were relied upon for the additional limitations cited in the dependent claims. Particularly,

1) claims 20, 21, 32, 34, 44, 55, 62, 64, 68, 76, 83, 85 and 89 were rejected as being unpatentable over Tso in view of Magallanes;

2) claims 33, 63 and 84 were rejected as being unpatentable over Tso-Magallanes and further in view of Dorricott (U.S. Patent No. 6,125,209);

3) claims 22, 24, 35, 36, 38, 41-43, 56, 57, 65, 67, 77, 78, 86 and 88 were rejected as being unpatentable over Tso-Magallanes and further in view of Gardell (U.S. Patent No. 6,049,831);

4) claims 23 and 39 were rejected as being unpatentable over Tso-Magallanes-Gardell and further in view of Ouellette (U.S. Patent No. 5,581,243);

5) claims 25, 37, 40, 66 and 87 were rejected as being unpatentable over Tso-Magallanes-Gardell and further in view of Clough (U.S. Patent No. 5,379,057);

6) claims 26-31, 45-51, 58-61, 69-74, 79-82 and 90-65 were rejected as being unpatentable over Tso-Magallanes and further in view of MacLeod (U.S. Patent No. 5,778,092); and

7) claims 52-54, 75 and 96 were rejected as being unpatentable over Tso-Magallanes and further in view of Cronin (U.S. Patent No. 6,182,127).

Applicant respectfully disagrees. No claim is currently amended. Claims 20-96 are pending. Applicant respectfully requests reconsideration of the pending claims in view of the following remarks.

Applicant respectfully submits that Tso and Magallanes are not in the same field of endeavor, since Tso relates to the transmission of *faxes* while Magallanes relates to World Wide *Web* access. Further, even if Tso and Magallanes were combined into a specification as suggested in the Office Action, the combined specification would not meet each and every aspect of the pending claims.

Applicant respectfully requests the examiner carefully consider the difference between *faxes* and web pages. A *fax* of Tso is an image (e.g., generated by a fax machine 10 of Tso). For viewing on a PDA, the fax image is processed on a computer system (e.g., 30 in Figures 1 and 2 of Tso) to recognize text, according to Tso. For example, Col. 3, lines 63-66, of Tso shows that optical character recognition software (e.g., OCR 340 in computer system 30, Figure 2 of Tso) is used to scan the image for text recognition. The text is then transmitted in a data file to the PDA for display. See, also, the abstract or summary of Tso. According to Tso, the recognized text is rendered at the destination device (see, e.g., Col. 2, lines 19-21, Tso).

A person skilled in the art understands that using a computer system to recognizing text in an image (performing OCR) for a PDA is completely different from using a host computer to render a document including text into an image.

It is understood that the fax image from the fax machine of Tso does not have links. The fax image from the fax machine of Tso does not have vector information including text.

Thus, even if Tso and Magallanes were combined into a specification as outline in the Office Action, the combined specification would not have each and every limitation as specified in the claims. In the combined specification, the computer (e.g., 30) of Tso would

perform OCR to recognize text from the fax image, which is opposite to rendering an image from a document with text (e.g., text as vector information), or a document with text and one or more links. The requested document in the combined specification would be a fax image, which includes neither "text and one or more links" nor "vector information including text".

Although Magallanes mentioned Internet access, which might include the access to web pages that might include links and text, it is not clear how the computer system (30) of Tso would process these web pages. At most, if the web pages were fax images that do not include links and text, the computer system (30) of Tso might run OCR to recognize text. If the web pages were in HTML, there would be no reason to run OCR. Furthermore, running OCR to recognize text from an image is opposite to rendering an image from text.

However, for example, claims 20 and 32 recite:

20. (previously presented) A method implemented on a server to serve documents, the method comprising:
receiving, at the server from a remote device, a request for a document, the document including text and one or more links;
rendering, at the server and for displaying on a screen attached to the remote device, an image from the entire document in response to the request, the image being larger than a screen area on the remote device available for displaying the document; and
sending, from the server to the remote device, the image in a compressed format as a response to the request for the document.

32. (previously presented) A method implemented on a portable device to access remote documents, the method comprising:
sending, from the device to a remote server, a request for a document, the document having vector information including text;

receiving, at the device, an image in a compressed format from the

remote server, <u>the image being rendered at the remote server</u>

<u>from the entire document in response to the request</u>;

storing the image in the compressed format on the device; and

according to a user input to the device, selectively displaying only a

portion of the image on a screen attached to the device

according to the image stored on the device.

Thus, even if Tso and Magallanes were combined into a specification as outline in the Office Action, the combined specification would not have each and every of limitations as specified in the claims. Actually, the combined system of Tso and Magallanes would be very different from what is claimed. Therefore, at least for the above reasons, the withdrawal of the rejections for the independent claims (claims 20, 32, 55, 62, 76 and 83) in view of Tso and Magallanes is respectfully requested.

Claims 55 and 62 recite machine readable media containing executable computer program instructions which when executed by a data processing system cause the system to perform the methods of claims 20 and 32, respectively. Claims 76 and 83 recite a server and a portable device for performing the methods of claims 20 and 32 respectively. Thus, the independent claims are patentable over the cited references at least for the above reasons.

Claims 21-31, 33-54, 56-61, 63-75, 77-82 and 84-96 depend from claims 20, 32, 55, 62, 76 and 83 respectively. The rejections under 35 U.S.C. 103(a) for the dependent claims were at least partially based on the rejection for the independent claims. Thus, claims 21-96 are patentable over the cited references at least for the above reasons.

Claims 20-96 were rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1-51 of U.S. Patent No. 6,633,314. The Office Action does not show why the pending claims are obvious over claims 1-51 of U.S. Patent No. 6,633,314, except that the context of this application is the same as the context of

U.S. Patent No. 6,633,314. However, similarity in context does not show specifically why the pending claims are obvious over claims 1-51 of U.S. Patent No. 6,633,314. Thus, applicant respectfully submits that the rejection is not proper.
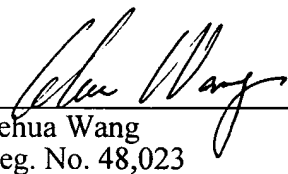
Thus, Applicant respectfully submits that the pending claims are patentable over the cited references. The withdrawal of the rejections under 35 U.S.C. 103(a) is respectfully requested.

Please charge any shortages or credit any overages to Deposit Account No. 02-2666. Furthermore, if an extension is required, Applicant hereby requests such extension.

Respectfully submitted,

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